

EXHIBIT A

PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Edward A. Zraick, Jr., *et al.*,

Defendants.

Adv. Pro. No. 10-05257 (SMB)

**ORDER STRIKING THE “SUPPLEMENTAL” EXPERT REPORTS OF
BRUCE G. DUBINSKY AND LISA M. COLLURA**

Upon the *Zraick Defendants’ Motion in Limine to Strike the “Supplemental” Expert Reports of Bruce G. Dubinsky and Lisa M. Collura* (the “Motion”),¹ filed by Defendants Edward A. Zraick, Jr., Nancy Zraick, Patricia DeLuca, and Karen M. Rich (collectively, “Defendants”), and the Court having considered all objections, declarations, replies and other pleadings related to the Motion, and the Court having heard argument on the Motion on _____, 2020, and upon the record herein after due deliberation thereon, good and sufficient cause exists for the granting of the relief as set forth herein, now therefore

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The supplemental expert reports of Bruce G. Dubinsky and Lisa M. Collura, each dated January 16, 2019 (together, the “Supplemental Reports”) are stricken.
3. The Trustee may not rely on any of the opinions set forth in the Supplemental Reports in this adversary proceeding.

Dated: _____, 2020
New York, New York

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE